

ATTACHMENT I-2
DEFENDANT'S VERDICT FORM

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson,
as Administrators of the Estate of
C.Z.B. and as surviving parents of
C.Z.B., a deceased minor,

Plaintiffs,

v.

Rough Country, LLC,

Defendant.

Case No. 2:22-CV-017-RWS

JURY TRIAL DEMANDED

ROUGH COUNTRY'S PROPOSED VERDICT FORM

We, the jury, return the following verdict:

COUNT ONE: STRICT LIABILITY

1. (a) Do you find by a preponderance of the evidence that Rough Country defectively designed, assembled, manufactured, or sold the lift kit at issue?

YES _____ NO _____

If you answered "NO" to question 1(a) above, please go to Question 2

(b) Do you find by a preponderance that the lift kit at issue was used in a manner reasonably foreseeable by Rough Country?

YES _____ NO _____

If you answered “NO” to Question 1(b), please go to Question 2.

(c) Do you find by a preponderance that the lift kit at issue was a substantial factor in producing damages over and above those which were probably caused as a result of the original impact or collision?

YES _____ NO _____

If you answer Question 1(c) is NO, your verdict is for Rough Country and you should not proceed further except to sign and date this verdict form and return it to the courtroom.

(d) Do you find by a preponderance that the lift kit at issue proximately caused the death of Cohen Bryson?

YES _____ NO _____

If you answer Question 1(d) is NO, your verdict is for Rough Country and you should not proceed further except to sign and date this verdict form and return it to the courtroom.

COUNT TWO: NEGLIGENCE

2. (a) Do you find by a preponderance of the evidence that Rough Country was negligent in its design, assembly, manufacture, or sale of the lift kit at issue?

YES _____ NO _____

If you answered “NO” to Question 1(a), please go to Note A.

(b) Do you find by a preponderance that Rough Country's negligence was a substantial factor in producing damages over and above those which were probably caused as a result of the original impact or collision?

YES _____ NO _____

If you answered "NO" to Question 2(b), please go to Note A.

(c) Do you find by a preponderance of the evidence that Rough Country's negligence was a proximate cause of Cohen Bryson's death?

YES _____ NO _____

NOTE A: *If your answers to Questions 1 (a, b, c, or d) and 2 (a, b, or c) are "NO", your verdict is for Rough Country and you should not proceed further except to date and sign this verdict form and return it to the courtroom.*

DAMAGES

You should only answer this if you answer Yes to all sub-parts of Questions 1 and/or 2.

3. What is the amount of damages, if any, to compensate the Brysons?

\$ _____

If you awarded damages in response to Question 3, please answer Question 4.

COUNT THREE: PUNITIVE DAMAGES

4. Under the circumstances of this case, do you find by clear and convincing evidence that punitive damages are warranted against Rough Country?

YES _____

NO _____

SO SAY WE ALL, this _____ day of _____, 20__.

FOREPERSON